

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: MAY 13 2014
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UNITED STATES OF AMERICA

:

INDICTMENT

- v. -

:

14 CRIM309

PARVEZ MUNSHI,

:

Defendant.

:

- - - - -X

COUNT ONE

(Conspiracy to Commit Bank Fraud)

1. From at least in or about June 2013, up to and including in or about December 2013, in the Southern District of New York and elsewhere, PARVEZ MUNSHI, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud in violation of Title 18, United States Code, Section 1344, to wit, MUNSHI and others conspired to submit fraudulent loan applications to banks in the names of straw borrowers using fake and fraudulent tax returns and other documents in order to trick the banks into extending loans so that MUNSHI and others could steal the loan proceeds.

2. It was a part and an object of the conspiracy that PARVEZ MUNSHI, the defendant, and others known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions,

JUDGE SCHEINDLIN

the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about October 10, 2013, in New York, New York, PARVEZ MUNSHI, the defendant, helped to complete and then sign fraudulent loan applications, knowing such fraudulent applications were to be submitted to a bank for the purpose of obtaining a loan.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION AS TO COUNT ONE

4. As a result of committing the offense alleged in Count One, PARVEZ MUNSHI, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offense, including but

not limited to, a sum of money representing the amount of proceeds obtained as a result of the said offense.


Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853.)


FOREPERSON


PREET BHARARA

United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Defendant.

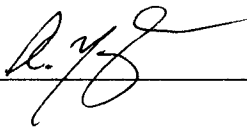
INDICTMENT

14 Cr.

§ (18 U.S.C. § 1349.)

PREET BHARARA
United States Attorney.

A TRUE BILL



Foreperson.

May 13, 2014

Filed Indictment. Case assigned to Judge Scheindlin.

U.S.M.S. Debra Freeman